



March 23, 2007

**FILED ELECTRONICALLY**

Ms. Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington DC 20554

Re: **EX PARTE** in Wireless Operations in the 3650-3700 MHz Band, ET Docket No. 04-151; Rules for Wireless Broadband Services in the 3650-3700 MHz Band, WT Docket No. 05-96

Dear Ms. Dortch:

On March 22, 2007, Peter Ecclesine and I met telephonically with the following staff members from the Office of Engineering and Technology: Julie Knapp, Ron Chase, Geraldine Matise, Mark Settle, Jeff Dygert, Jamison Prime and Ahmed Lajouji. We updated staff on the progress made by IEEE Task Group 802.11y, which has been developing a standard that conforms to the FCC rules announced in the above-captioned dockets. Mr. Ecclesine is the Chair of the task group, but in speaking to the FCC was representing only Cisco's views. Cisco supports the FCC rules as adopted.

*Significant progress has been made on outstanding issues.* Cisco reviewed the substantial progress that has been made to date on the draft standard. The task group's goal is to ensure that the standard can support networks for both the home and business as well as outdoor backhaul. In the most recent meeting, the task group resolved three major issues raised in previous balloting as follows. First, the group decided to modify language to ensure that nothing in the 802.11y standard would prohibit MIMO antenna technology. Second, the group elected to utilize common language developed in other task groups (and representing the latest technology) so that there are common methods of making a channel switch announcement, including not just the ability to change channels, but the ability to change channel widths, emissions masks, power, and other behaviors. Finally, the group resolved that their approach, requiring transmission of unique identifiers so that anyone subject to interference could locate the enabling base station, should be maintained since this requirement flows from the FCC's rules for the 3650 MHz band. In addition, the standard includes a protocol that provides for a minimum of unintended transmissions in the band, by creating "time-out" penalties for failure to become associated with an enabling device.

*Standard could be adopted in December 2007.* As a result of this forward momentum, the group expects to recirculate the draft standard for any comments on the updates, and believes that the draft could be submitted for sponsor ballot in July 2007. That puts the standard on a trajectory optimistically to be adopted in December 2007, or at the latest, March 2008. There are now 325 eligible voters in the working group, with over 90% participation in the most recent vote.

Finally, staff asked for information on the status of efforts by IEEE 802.16 to determine if that technology could coexist in the same frequency with IEEE 802.11y. We stated that we were aware of several independent efforts by IEEE 802.16 participants to model coexistence, but were not aware of any completed modeling exercises, given that 802.16 was designed as a licensed service provider technology. In further discussing the licensed service provider approach, we noted that the Part 90 emissions mask essentially strands 5 MHz at each band edge, which in the case of 3650 MHz would suggest that a licensed approach to this band will need to accommodate fewer licensees and/or less spectrum per licensee. In comparison, a spectrum-sharing approach of the type that the Commission adopted in the Report and Order allows multiple users on each frequency in any given area.

Respectfully submitted,



Mary L. Brown  
Director, Technology and Spectrum Policy  
Cisco Systems  
1300 Pennsylvania Ave. NW Suite 250  
Washington DC 20005  
(202) 354-2923